February 7, 2023

VIA ECF

The Honorable Paul G. Gardephe, U.S.D.J. Thurgood Marshall United States Courthouse 40 Foley Square, Courtroom 705 New York, NY 10007

Re: Joint Letter in <u>Tang v. Tang</u>, No. 22 Civ. 5736 (PGG) (S.D.N.Y.)

Dear Judge Gardephe:

Plaintiff Vincent Tang and Defendant Wilson Tang respectfully submit this joint letter to provide an update on the Parties' anticipated out-of-court mediation. At the request of the mediator, and in order to provide time for the Parties to collect and provide further requested information, and for the mediator to consider it, the Parties have agreed to adjourn the mediation until February 27, 2023, from the previously scheduled date of February 8.

The Parties continue to believe that the mediation will be productive and potentially obviate the need for continued litigation. The Parties therefore respectfully request that the Court adjourn the pretrial conference scheduled to take place on February 23, 2023, see ECF No. 28, and continue to refrain from scheduling a pre-motion conference on Defendant's anticipated motion to dismiss, see ECF Nos. 21, 24, until after the Parties' mediation. If appropriate following the mediation, the Parties are available for a civil conference on March 16 or any Thursday thereafter that is convenient to the Court. In accordance with the Court's direction on January 13, ECF No. 28, the Parties will submit a joint letter two days after the February 27 mediation, updating the court on the status of the case.

Respectfully submitted,

Hon. Paul G. Gardephe Page 2

CAHILL GORDON & REINDEL, LLP

GIBSON, DUNN & CRUTCHER LLP

By: /s/ Michael B. Weiss

Michael B. Weiss
Paul G. D. Morales

CAHILL GORDON & REINDEL LLP

32 Old Slip

New York, NY 10005 Telephone: 212-701-3000 mweiss@cahill.com pgmorales@cahill.com

David Dong Ann Lin LEWIS & LIN, LLC 77 Sands Street, 6th Floor Brooklyn, NY 11201 Telephone: 718-243-9323 david@ilawco.com

Counsel for Plaintiff Vincent Tang

Orin Snyder Brian C. Ascher David P. Salant

By: /s/ Orin Snyder

GIBSON, DUNN & CRUTCHER LLP

200 Park Avenue
New York, NY 10166
Telephone: 212.351.3989
OSnyder@gibsondunn.com
BAscher@gibsondunn.com
DSalant@gibsondunn.com

Counsel for Defendant Wilson Tang

cc: All Counsel of Record (via ECF)

MEMO ENDORSED: The conference scheduled for February 23, 2023 is adjourned to April 6, 2023 at 9:30 a.m. in Courtroom 705 of the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York.

SO ORDERED.

Paul G. Gardephe

United States District Judge Date: February 10, 2023

S. Landgete